REMARKS

Claims 1-12, 14-19, 21-26 and 28-31 as amended, remain herein.

Applicant has amended the claims mooting the objections to claims 1, 22 and 27.

Applicant has amended claims 2, 7 and 19 mooting the rejections under 35 U.S.C. §112, second paragraph made thereto.

Claims 21 and 22 were rejected under 35 U.S.C. §102(b) over Baker U.S. Patent 5,428,349.

Baker discloses a password access method/algorithm for monitoring the entry of a password without disclosing the letters or numerals contained in the password. This method includes the steps of generating and displaying a random matrix of characters along with a set of keys for selection of each column of characters. Each key is associated with multiple characters. With Baker's method, the user selects only the column in which the character of the password appears from the matrix. This step is repeated for the additional characters of the password. However, Baker does not disclose that variables are selected from a predetermined set of combinations listed in a table that contains all possible combinations of variables and virtual keys without any repetition of variables, as claimed by applicant. Further, Baker employs hardware keys for selecting the characters. Thus, Baker does not disclose the virtual keys, virtual keyboard, or virtual keypad claimed by applicant. Further, Baker does not disclose displaying the virtual keys in different arrangements and positions on a virtual keyboard, virtual keypad, or graphical user interface as claimed by applicant. The use of virtual keys is an

important security feature of the claimed invention in that the keys may be placed at varying positions and arrangements on the screen, thereby reducing the chance that an eavesdropper could discern the typed in pin number by observing the hand movements or left-over fingerprints of the user as is possible with a fixed hardware keyboard.

Still further, Baker describes that the variables are assigned to the keys randomly only. Thus, Baker does not describe that variables are selected from a predetermined set of combinations as claimed by applicant.

For all of the foregoing reasons, Baker does not disclose all elements of applicant's claimed invention and therefore is not a proper basis for a §102 rejection of applicant's claims. Nor is there any disclosure or teaching in Baker which would have suggested applicant's claimed invention. Thus reconsideration and withdrawal of this rejection, and allowance of claims 21 and 22 is respectfully requested.

Claims 21 and 22 were rejected under 35 U.S.C. §102(b) over Patarin et al. U.S. Patent No. 5,815,083.

Patarin discloses a system for impeding the ability of eavesdroppers to intercept the password of a user as they enter it into a remote terminal. This system associates these symbols with characters used to define a password by randomly positioning the symbols in relation to the characters. The transmission of these random symbols substituted for the exact password characters is disclosed to impede the ability of eavesdroppers to intercept and decode the original password. In Patarin, the symbols represent the numbers shown below the symbols. Thus, even

though Patarin's keys have a number and a symbol assigned to it, the number is represented by the symbol. Patarin's number and symbol represent the same value. Thus, Patarin does not disclose that different character combinations are associated with different keys for different attempts at inputting information by a user where each variable in the combination of variables represents a different value, as claimed by applicants. Further, Patarin does not disclose that variables are selected from a predetermined set of combinations listed in a table that contains all possible combinations of variables and virtual keys without any repetition of variables, as claimed by applicant. In Patarin one symbol is assigned to each number only. This configuration does not prevent an eavesdropper from identifying the digits of the user's access code when watching the keyboard in a sufficiently close manner so as to be able to view the symbols associated to each variable. On the other hand, the applicant's claimed invention prevents an eavesdropper from identifying the exact digits of user's access code, even when the numbers associated with each typed key are visible to him since in the applicant claimed invention at least two variables are associated with each key.

For all of the foregoing reasons, Patarin does not disclose all elements of applicant's claimed invention and therefore is not a proper basis for a §102 rejection of applicant's claims. Nor is there any disclosure or teaching in Patarin which would have suggested applicant's claimed invention. Thus reconsideration and withdrawal of this rejection, and allowance of claims 21 and 22 is respectfully requested.

Claim 12 was rejected under 35 U.S.C. §102(e) over Chasko et al. U.S. Patent No. 6,715,078.

Chasko discloses a PIN encryption device that operates in connection with user PINs. Chasko's device includes a touch screen device divided into a protected data entry screen area and an unprotected data entry screen area. Chasko's device determines whether a touch input detected by the touch screen device originated in the protected data entry screen area or the unprotected data entry screen area. An encryption device encrypts touch inputs that originated in the protected data entry screen area. Chasko shows a conventional keypad in which single keys are each associated with a single number and multiple letters. However, Chasko does not disclose that different combinations of variables are associated with different virtual keys for different attempts to input an access code, as claimed by applicant.

For all of the foregoing reasons, Chasko does not disclose all elements of applicant's claimed invention and therefore is not a proper basis for a §102 rejection of applicant's claims. Nor is there any disclosure or teaching in Chasko which would have suggested applicant's claimed invention. Thus reconsideration and withdrawal of this rejection, and allowance of claim 12 is respectfully requested.

Claims 1-5, 7, 10, 11, 13-16, 20, 21, 23, 24 and 26-30 are rejected under 35 U.S.C. §103(a) over Chasko. Claims 13 and 20 are canceled without prejudice or disclaimer.

As discussed above, Chasko discloses a PIN encryption device that operates in connection with user PINs. However, Chasko does not disclose that different combinations of

variables are associated with different virtual keys for different attempts to input an access code, as claimed by applicant. Further, Chasko does not disclose a table that contains all possible combinations of variables and virtual keys without any repetition of variables for randomly assigning a set of variables to the plurality of virtual keys, as claimed by applicant.

For all of the foregoing reasons, there is no disclosure or teaching in Chasko that would have suggested applicant's claimed invention to one of ordinary skill in this art. Further, there is no disclosure or teaching in Chasko that would have suggested the desirability of modifying any portions thereof effectively to anticipate or suggest applicant's claimed invention. Withdrawal of this rejection and allowance of all claims are therefore respectfully requested.

Claims 6, 17 and 31 are rejected under 35 U.S.C. §103(a) over Chasko and Patarin.

Claims 6, 17 and 31, which now depend from claims 1, 12 and 24 respectively, are allowable for at least the same reasons discussed above with respect to claim 1, 12 and 24.

Patarin does not disclose what is missing in Chasko. Patarin discloses a keyboard where number are associated with corresponding symbols, but not that different combinations of variables are associated with different virtual keys for different attempts to input an access code, as claimed by applicant. Further, Patarin does not disclose a table that contains all possible combinations of variables and virtual keys without any repetition of variables for randomly assigning a set of variables to the plurality of virtual keys, as claimed by applicant.

For all of the foregoing reasons, there is no disclosure or teaching in Chasko or Patarin that would have suggested applicant's claimed invention to one of ordinary skill in this art.

Further, there is no disclosure or teaching in Chasko or Patarin that would have suggested the desirability of modifying or combining any portions thereof effectively to anticipate or suggest applicant's claimed invention. Withdrawal of this rejection and allowance of all claims are therefore respectfully requested.

Claims 8, 9, 18 and 19 were rejected under 35 U.S.C. §103(a) over Chasko and Maddalozzo, Jr. et al. U.S. Patent No. 6,434,702.

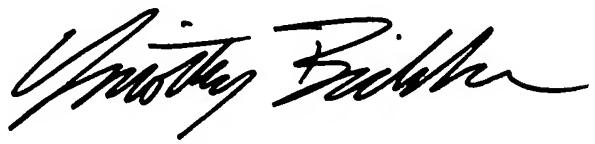
Claims 8, 9, 18 and 19, which now depend from claims 1 and 12, are allowable for at least the same reasons discussed above with respect to claim 1 and 12.

Maddalozzo does not disclose what is missing in Chasko. Maddalozzo discloses a keypad where the keys may be repositioned and assigned to a single different variable after each character or number of the password is entered, but not that different combinations of variables are associated with different virtual keys for different attempts to input an access code, as claimed by applicant.

For all of the foregoing reasons, there is no disclosure or teaching in Chasko or Maddalozzo that would have suggested applicant's claimed invention to one of ordinary skill in this art. Further, there is no disclosure or teaching in Chasko or Maddalozzo that would have suggested the desirability of modifying or combining any portions thereof effectively to anticipate or suggest applicant's claimed invention. Withdrawal of this rejection and allowance of all claims are therefore respectfully requested.

The PTO is hereby authorized to charge/credit any fee deficiencies or overpayments to Deposit Account No. 19-4293 (Order No. 15545.0001). If further amendments would place this application in even better condition for issue, the Examiner is invited to call applicant's undersigned attorney at the number listed below.

Respectfully submitted,



Date: November 27, 2006

Timothy C. Bickham, Reg. No. 41,618
Tyson Y. Winarski, Reg. No. 41,381

STEPTOE & JOHNSON LLP
1330 Connecticut Ave., N.W.
Washington, D.C. 20036
(202) 429-3000 Telephone
(202) 429-3902 Facsimile

TCB/TYW:mnl